

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

In re:	§	Chapter 11
	§	
KRISJENN RANCH, LLC,	§	Case No. 20-50805
	§	
Debtor.	§	
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KRISJENN RANCH, LLC and	§	
KRISJENN RANCH, LLC-SERIES	§	
UVALDE RANCH, and KRISJENN	§	
RANCH, LLC-SERIES PIPELINE	§	
ROW as successors in interest to	§	
BLACKDUCK PROPERTIES, LLC,	§	
	§	
Plaintiffs	§	
	§	
v.	§	
	§	
DMA PROPERTIES, INC., and	§	
LONGBRANCH ENERGY, LP,	§	Adversary No. 20-05027
	§	
Defendants	§	
<hr/>		
DMA PROPERTIES, INC.	§	
	§	
Cross-Plaintiff/Third Party Plaintiff	§	
	§	
v.	§	
	§	
KRISJENN RANCH, LLC,	§	
KRISJENN RANCH, LLC-SERIES	§	
UVALDE RANCH, and KRISJENN	§	
RANCH, LLC-SERIES PIPELINE ROW.	§	Adversary No. 20-050207
BLACK DUCK PROPERTIES, LLC,	§	
LARRY WRIGHT, and JOHN TERRELL,	§	
	§	
Cross-Defendants/Third-Party Defendants.	§	

**LARRY WRIGHT**  
**ANSWERS TO POST-JUDGMENT INTERROGATORIES**

Larry Wright hereby submits the following Answers to DMA Properties, Inc. and Longbranch Energy, LP's Post-Judgment Interrogatories:

Respectfully submitted,

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ATTORNEY FOR LARRY WRIGHT

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 6<sup>th</sup> day of December 2024:

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William P. Germany  
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## **INTERROGATORIES**

**INTERROGATORY NO. 1:** Please state for each person answering these interrogatories your full legal name, including your middle name, and each other name you have used at any time, including each nickname, alias, and (if appropriate) married name from before your marriage.

**ANSWER:** Larry Wright.

**INTERROGATORY NO. 2:** Have you filed an assumed name certificate or partnership certificate in the last 10 years? If so, for each certificate please state:

- a. The full assumed or partnership name used.
- b. The full name of the person using it.
- c. The city, county, and state in which the assumed or partnership name was primarily used.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 3:** Please list all assets belonging to KrisJenn Ranch.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 4:** Please list all assets belonging to KrisJenn–Uvalde.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 5:** Please list all assets belonging to KrisJenn–Pipeline Row.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright..

**INTERROGATORY NO. 6:** Please list all assets belonging to Wright.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 7:** Please state KrisJenn Ranch’s Tax Identification Number(s), if any.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 8:** Please state KrisJenn– Uvalde's Identification Number(s), if any.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 9:** Please state KrisJenn– Pipeline Row’s Identification Number(s), if any.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 10:** Please state Wright’s Tax Identification Number(s), if any.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 11:** Please state each of your current business addresses and/or operating addresses (street address, city, county, state) and telephone numbers (including area code). Also please state each post office box address used.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024,

final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 12:** Does KrisJenn Ranch receive income or benefits from any source, including current accounts receivable? If Wright does receive such income or benefits, for each source please state:

- a. The full name and complete address of the source or account receivable.
- b. The amount of the income, benefits or account receivable.
- c. Precisely when each payment is received throughout the year.
- d. The full name, complete address, and telephone number of each person, financial institution, or other entity with which you deposit the payments.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 13:** Does KrisJenn–Uvalde receive income or benefits from any source, including current accounts receivable? If Wright does receive such income or benefits, for each source please state:

- a. The full name and complete address of the source or account receivable.
- b. The amount of the income, benefits or account receivable.
- c. Precisely when each payment is received throughout the year.
- d. The full name, complete address, and telephone number of each person, financial institution, or other entity with which you deposit the payments.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 14:** Does KrisJenn–Pipeline Row receive income or benefits from any source, including current accounts receivable? If Wright does receive such income or benefits, for each source please state:

- a. The full name and complete address of the source or account receivable.
- b. The amount of the income, benefits or account receivable.
- c. Precisely when each payment is received throughout the year.
- d. The full name, complete address, and telephone number of each person, financial institution, or other entity with which you deposit the payments.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 15:** Does Wright receive income or benefits from any source, including current accounts receivable? If Wright does receive such income or benefits, for each source please state:

- a. The full name and complete address of the source or account receivable.
- b. The amount of the income, benefits or account receivable.
- c. Precisely when each payment is received throughout the year.
- d. The full name, complete address, and telephone number of each person, financial institution, or other entity with which you deposit the payments.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 16:** For each of your expenses that recurs on a monthly or other regular basis and exceeds \$500, please state:

- a. The frequency with which payments are made.
- b. The amount of each payment and either (1) that this amount is the same for each payment or (2) that this amount is an average for the past year.
- c. The full name and complete address of the recipient of the payments.
- d. The full name and complete address of each person or entity from whom you acquire the assets to make payments.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 17:** Does KrisJenn Ranch have an ownership interest in, option to purchase, contract to sell, leasehold in, or other interest in any real estate? If so, for each property please state:

- a. The legal and common descriptions and the location of the property.
- b. The size of the property.

- c. A description of every improvement on the property.
- d. The name of the person or entity having the interest.
- e. The full name and complete address of every other person or entity having any kind of interest in the property.
- f. The present value of the equity KrisJenn Ranch has in the property.
- g. Whether the property is encumbered. If it is, also please state:
  - (1) The nature of the encumbrance.
  - (2) The full name and complete address of the holder of the encumbrance.
  - (3) The amount of the encumbrance.
- h. The cost of the property, excluding improvements.
- i. When and how the property was bought or acquired.
- j. Whether any part of the property is within the corporate limits of a town and, if so, the name of the town.
- k. Whether any money or property has been placed in escrow. If it has, also please state:
  - (1) The full name and complete address of the person or entity now having possession of the escrow amount or property.
  - (2) The amount of money or value of the property in escrow.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 18:** Does KrisJenn–Uvalde have an ownership interest in, option to purchase, contract to sell, leasehold in, or other interest in any real estate? If so, for each property please state:

- a. The legal and common descriptions and the location of the property.
- b. The size of the property.
- c. A description of every improvement on the property.
- d. The name of the person or entity having the interest.
- e. The full name and complete address of every other person or entity having any kind of interest in the property.
- f. The present value of the equity KrisJenn Uvalde has in the property.
- g. Whether the property is encumbered. If it is, also please state:
  - (1) The nature of the encumbrance.
  - (2) The full name and complete address of the holder of the encumbrance.
  - (3) The amount of the encumbrance.
- h. The cost of the property, excluding improvements.
- i. When and how the property was bought or acquired.
- j. Whether any part of the property is within the corporate limits of a town and, if so, the name of the town.



- k. Whether any money or property has been placed in escrow. If it has, also please state:
- (1) The full name and complete address of the person or entity now having possession of the escrow amount or property.
  - (2) The amount of money or value of the property in escrow.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright..

**INTERROGATORY NO. 19:** Does KrisJenn–Pipeline Row have an ownership interest in, option to purchase, contract to sell, leasehold in, or other interest in any real estate? If so, for each property please state:

- a. The legal and common descriptions and the location of the property.
- b. The size of the property.
- c. A description of every improvement on the property.
- d. The name of the person or entity having the interest.
- e. The full name and complete address of every other person or entity having any kind of interest in the property.
- f. The present value of the equity KrisJenn–Pipeline Row has in the property.
- g. Whether the property is encumbered. If it is, also please state:
  - (1) The nature of the encumbrance.
  - (2) The full name and complete address of the holder of the encumbrance.
  - (3) The amount of the encumbrance.
- h. The cost of the property, excluding improvements.
- i. When and how the property was bought or acquired.
- j. Whether any part of the property is within the corporate limits of a town and, if so, the name of the town.
- k. Whether any money or property has been placed in escrow. If it has, also please state:
  - (1) The full name and complete address of the person or entity now having possession of the escrow amount or property.
  - (2) The amount of money or value of the property in escrow.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 20:** Does Wright have an ownership interest in, option to purchase, contract to sell, leasehold in, or other interest in any real estate? If so, for each property please state:

- a. The legal and common descriptions and the location of the property.
- b. The size of the property.

- c. A description of every improvement on the property.
- d. The name of the person (Wright, his spouse, or both) having the interest.
- e. The full name and complete address of every other person or entity having any kind of interest in the property.
- f. The present value of the equity Wright has in the property.
- g. Whether the property is encumbered. If it is, also please state:
  - (1) The nature of the encumbrance.
  - (2) The full name and complete address of the holder of the encumbrance.
  - (3) The amount of the encumbrance.
- h. The cost of the property, excluding improvements.
- i. When and how the property was bought or acquired.
- j. Whether any part of the property is within the corporate limits of a town and, if so, the name of the town.
- k. Whether any money or property has been placed in escrow. If it has, also please state:
  - (1) The full name and complete address of the person or entity now having possession of the escrow amount or property.
  - (2) The amount of money or value of the property in escrow.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 21:** Is there any checking account, savings account, trust fund, money market account, pension plan, profit-sharing plan, mutual fund, or other account or fund of money in which KrisJenn Ranch either owns an interest or has any right whatsoever? If there is, for each account please state:

- a. The full name and relationship to KrisJenn Ranch of each person owning an interest in the account or having access to it.
- b. The name (or title) and number of the account.
- c. The full name and complete address of the person holding the fund.
- d. The present balance in the account.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 22:** Is there any checking account, savings account, trust fund, money market account, pension plan, profit-sharing plan, mutual fund, or other account or fund of money in which KrisJenn-Uvalde either owns an interest or has any right whatsoever? If there is, for each account please state:

- a. The full name and relationship to KrisJenn—Uvalde of each person owning an interest in the account or having access to it.
- b. The name (or title) and number of the account.
- c. The full name and complete address of the person holding the fund.
- d. The present balance in the account.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 23:** Is there any checking account, savings account, trust fund, money market account, pension plan, profit-sharing plan, mutual fund, or other account or fund of money in which KrisJenn—Pipeline Row either owns an interest or has any right whatsoever? If there is, for each account please state:

- a. The full name and relationship to KrisJenn—Pipeline Row of each person owning an interest in the account or having access to it.
- b. The name (or title) and number of the account.
- c. The full name and complete address of the person holding the fund.
- d. The present balance in the account.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 24:** Is there any checking account, savings account, trust fund, money market account, pension plan, profit-sharing plan, mutual fund, or other account or fund of money in which Wright either owns an interest or has any right whatsoever? If there is, for each account please state:

- a. The full name and relationship to Wright of each person owning an interest in the account or having access to it.
- b. The name (or title) and number of the account.
- c. The full name and complete address of the person holding the fund.
- d. The present balance in the account.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 25:** Is there any real estate or personal property that any person or entity holds title to or possess in the name or for the benefit of KrisJenn Ranch? If there is, for each property please state:

- a. The full name of the person in whose name the property is held and, if it is not in KrisJenn Ranch's name, his relationship with the person for whose benefit it is held.
- b. The full name of the person for whose benefit the property is held and, if it is not for KrisJenn Ranch's benefit, KrisJenn Ranch's relationship with the person for whose benefit it is held.
- c. A detailed description of the property.
- d. The value of the property.
- e. The full name, complete address, and telephone number of the person or entity holding the property.
- f. The relationship between the person or entity holding the property and the person for whose benefit is held.
- g. A detailed description of the arrangements under which the property is being held, including a description of the interest KrisJenn Ranch has in the property.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 26:** Is there any real estate or personal property that any person or entity holds title to or possess in the name or for the benefit of KrisJenn—Uvalde? If there is, for each property please state:

- a. The full name of the person in whose name the property is held and, if it is not in KrisJenn—Uvalde's name, his relationship with the person for whose benefit it is held.
- b. The full name of the person for whose benefit the property is held and, if it is not for KrisJenn—Uvalde's benefit, KrisJenn—Uvalde's relationship with the person for whose benefit it is held.
- c. A detailed description of the property.
- d. The value of the property.
- e. The full name, complete address, and telephone number of the person or entity holding the property.
- f. The relationship between the person or entity holding the property and the person for whose benefit is held.
- g. A detailed description of the arrangements under which the property is being held, including a description of the interest KrisJenn—Uvalde has in the property.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 27:** Is there any real estate or personal property that any person or entity holds title to or possess in the name or for the benefit of KrisJenn–Pipeline Row? If there is, for each property please state:

- a. The full name of the person in whose name the property is held and, if it is not in KrisJenn–Pipeline Row’s name, his relationship with the person for whose benefit it is held.
- b. The full name of the person for whose benefit the property is held and, if it is not for KrisJenn–Pipeline Row’s benefit, KrisJenn–Pipeline Row’s relationship with the person for whose benefit it is held.
- c. A detailed description of the property.
- d. The value of the property.
- e. The full name, complete address, and telephone number of the person or entity holding the property.
- f. The relationship between the person or entity holding the property and the person for whose benefit is held.
- g. A detailed description of the arrangements under which the property is being held, including a description of the interest KrisJenn–Pipeline Row has in the property.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 28:** Is there any real estate or personal property that any person or entity holds title to or possess in the name or for the benefit of Wright? If there is, for each property please state:

- a. The full name of the person in whose name the property is held and, if it is not in Wright’s name, his relationship with the person for whose benefit it is held.
- b. The full name of the person for whose benefit the property is held and, if it is not for Wright’s benefit, Wright’s relationship with the person for whose benefit it is held.
- c. A detailed description of the property.
- d. The value of the property.
- e. The full name, complete address, and telephone number of the person or entity holding the property.
- f. The relationship between the person or entity holding the property and the person for whose benefit is held.
- g. A detailed description of the arrangements under which the property is being held, including a description of the interest Wright’s has in the property.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income

of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 29:** Has KrisJenn Ranch furnished a financial statement to any person or entity in the last five years? If KrisJenn Ranch has furnished such a statement, for each financial statement please state:

- a. The full name and complete address of each person or entity to whom it was furnished.
- b. The date it was furnished.
- c. The contents of the statement, quoting verbatim or (if KrisJenn Ranch will do so without a court order) attaching a copy of it to your answers.
- d. The name of the person who furnished the statement.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 30:** Has KrisJenn–Uvalde furnished a financial statement to any person or entity in the last five years? If KrisJenn–Uvalde has furnished such a statement, for each financial statement please state:

- a. The full name and complete address of each person or entity to whom it was furnished.
- b. The date it was furnished.
- c. The contents of the statement, quoting verbatim or (if KrisJenn–Uvalde will do so without a court order) attaching a copy of it to your answers.
- d. The name of the person who furnished the statement.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 31:** Has KrisJenn–Pipeline Row furnished a financial statement to any person or entity in the last five years? If KrisJenn–Pipeline Row has furnished such a statement, for each financial statement please state:

- a. The full name and complete address of each person or entity to whom it was furnished.
- b. The date it was furnished.
- c. The contents of the statement, quoting verbatim or (if KrisJenn–Pipeline Row will do so without a court order) attaching a copy of it to your answers.
- d. The name of the person who furnished the statement.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 32:** Has Wright furnished a financial statement to any person or entity in the last five years? If Wright has furnished such a statement, for each financial statement please state:

- a. The full name and complete address of each person or entity to whom it was furnished.
- b. The date it was furnished.
- c. The contents of the statement, quoting verbatim or (if you will do so without a court order) attaching a copy of it to your answers.
- d. The name of the person who furnished the statement.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 33:** Attach to your answers a copy of each federal income tax return or other federal financial disclosure required to be filed with the United States Government from the last five years for KrisJenn Ranch. Please state:

- a. The source and amount of each item of income listed.
- b. The total income received for each year, whether or not reported.
- c. The date each return was filed and the address of the Internal Revenue Service office where it was filed.
- d. The amount and source of each amount of income received but not shown on any of the returns that you are attaching to your answers.
- e. The full name and complete address of each person who worked on or helped prepare each return.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 34:** Attach to your answers a copy of each federal income tax return or other federal financial disclosure required to be filed with the United States Government from the last five years for KrisJenn–Uvalde. Please state:

- e. The source and amount of each item of income listed.

- f. The total income received for each year, whether or not reported.
  - g. The date each return was filed and the address of the Internal Revenue Service office where it was filed.
  - h. The amount and source of each amount of income received but not shown on any of the returns that you are attaching to your answers.
  - f. The full name and complete address of each person who worked on or helped prepare each return.
- [sic]

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 35:** Attach to your answers a copy of each federal income tax return or other federal financial disclosure required to be filed with the United States Government from the last five years for KrisJenn–Pipeline Row. Please state:

- a. The source and amount of each item of income listed.
- b. The total income received for each year, whether or not reported.
- c. The date each return was filed and the address of the Internal Revenue Service office where it was filed.
- d. The amount and source of each amount of income received but not shown on any of the returns that you are attaching to your answers.
- g. The full name and complete address of each person who worked on or helped prepare each return. [sic]

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 36:** Attach to your answers a copy of each federal income tax return or other federal financial disclosure required to be filed with the United States Government from the last five years for Wright. Please state:

- a. The source and amount of each item of income listed.
- b. The total income received for each year, whether or not reported.
- c. The date each return was filed and the address of the Internal Revenue Service office where it was filed.
- d. The amount and source of each amount of income received but not shown on any of the returns that you are attaching to your answers.
- h. The full name and complete address of each person who worked on or helped prepare each return. [sic]



**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 37:** Does KrisJenn Ranch now own, claim any interest in, or have title to any vehicle (including but not limited to automobiles, trucks, boats, aircraft, motorcycles)? If so, for each vehicle please state:

- a. A complete description of the vehicle, including (as applicable) its year, make, model, serial number, and other permanent identification numbers.
- b. The general condition of the vehicle.
- c. The complete address of its current location.
- d. The full name and complete address of each person or entity having control over the vehicle.
- e. Its present estimated market value.
- f. The name of the person having title to or an interest in the vehicle and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 38:** Does KrisJenn–Uvalde now own, claim any interest in, or have title to any vehicle (including but not limited to automobiles, trucks, boats, aircraft, motorcycles)? If so, for each vehicle please state:

- a. A complete description of the vehicle, including (as applicable) its year, make, model, serial number, and other permanent identification numbers.
- b. The general condition of the vehicle.
- c. The complete address of its current location.
- d. The full name and complete address of each person or entity having control over the vehicle.
- e. Its present estimated market value.
- f. The name of the person having title to or an interest in the vehicle and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 39:** Does KrisJenn–Pipeline Row now own, claim any interest in, or have title to any vehicle (including but not limited to automobiles, trucks, boats, aircraft, motorcycles)? If so, for each vehicle please state:

- a. A complete description of the vehicle, including (as applicable) its year, make, model, serial number, and other permanent identification numbers.
- b. The general condition of the vehicle.
- c. The complete address of its current location.
- d. The full name and complete address of each person or entity having control over the vehicle.
- e. Its present estimated market value.
- f. The name of the person having title to or an interest in the vehicle and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 40:** Does Wright now own, claim any interest in, or have title to any vehicle (including but not limited to automobiles, trucks, boats, aircraft, motorcycles)? If so, for each vehicle please state:

- a. A complete description of the vehicle, including (as applicable) its year, make, model, serial number, and other permanent identification numbers.
- b. The general condition of the vehicle.
- c. The complete address of its current location.
- d. The full name and complete address of each person or entity having control over the vehicle.
- e. Its present estimated market value.
- f. The name of the person having title to or an interest in the vehicle and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 41:** Does KrisJenn Ranch claim any interest in, or have title to any of the following kinds of property?

1. Stocks, bonds, or other securities.

2. Mortgages or liens on real or personal property.
3. Promissory notes, drafts, bills of exchange, or other commercial paper.
4. Judgments.
5. Savings bonds or other government-issued bonds.
6. Any interests in oil, gas, or mineral leases.
7. Certificates of deposit, letters of credit, money orders, cashier's checks, traveler's checks, bank deposits, or escrow funds.
8. Keogh plans, individual retirement accounts, profit-sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits, or other retirement plans.
9. Leases, life estates, remainder interests, or other interests in real property.
10. Patents, copyrights, trademarks, service marks, franchises, or other such licenses.

If you do and if the information sought in this question has not been provided in another answer, for each item of property please state:

- a. A complete description of the item, including account number, registration number, other permanent identification numbers, and other specified identification.
- b. The full name and complete address of the person in whose name the item is held.
- c. The present value of the item.
- d. The amount of the indebtedness outstanding against the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 42:** Does KrisJenn—Uvalde claim any interest in, or have title to any of the following kinds of property?

1. Stocks, bonds, or other securities.
2. Mortgages or liens on real or personal property.
3. Promissory notes, drafts, bills of exchange, or other commercial paper.
4. Judgments.
5. Savings bonds or other government-issued bonds.
6. Any interests in oil, gas, or mineral leases.
7. Certificates of deposit, letters of credit, money orders, cashier's checks, traveler's checks, bank deposits, or escrow funds.
8. Keogh plans, individual retirement accounts, profit-sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits, or other retirement plans.
9. Leases, life estates, remainder interests, or other interests in real property.

10. Patents, copyrights, trademarks, service marks, franchises, or other such licenses.

If you do and if the information sought in this question has not been provided in another answer, for each item of property please state:

- a. A complete description of the item, including account number, registration number, other permanent identification numbers, and other specified identification.
- b. The full name and complete address of the person in whose name the item is held.
- c. The present value of the item.
- d. The amount of the indebtedness outstanding against the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 43:** Does KrisJenn—Pipeline Row claim any interest in, or have title to any of the following kinds of property?

1. Stocks, bonds, or other securities.
2. Mortgages or liens on real or personal property.
3. Promissory notes, drafts, bills of exchange, or other commercial paper.
4. Judgments.
5. Savings bonds or other government-issued bonds.
6. Any interests in oil, gas, or mineral leases.
7. Certificates of deposit, letters of credit, money orders, cashier's checks, traveler's checks, bank deposits, or escrow funds.
8. Keogh plans, individual retirement accounts, profit-sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits, or other retirement plans.
9. Leases, life estates, remainder interests, or other interests in real property.
10. Patents, copyrights, trademarks, service marks, franchises, or other such licenses.

If you do and if the information sought in this question has not been provided in another answer, for each item of property please state:

- a. A complete description of the item, including account number, registration number, other permanent identification numbers, and other specified identification.
- b. The full name and complete address of the person in whose name the item is held.
- c. The present value of the item.
- d. The amount of the indebtedness outstanding against the item.

- e. The name of the person having title to or an interest in the item and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 44:** Does Wright claim any interest in, or have title to any of the following kinds of property?

1. Stocks, bonds, or other securities.
2. Mortgages or liens on real or personal property.
3. Promissory notes, drafts, bills of exchange, or other commercial paper.
4. Judgments.
5. Savings bonds or other government-issued bonds.
6. Any interests in oil, gas, or mineral leases.
7. Certificates of deposit, letters of credit, money orders, cashier's checks, traveler's checks, bank deposits, or escrow funds.
8. Keogh plans, individual retirement accounts, profit-sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits, or other retirement plans.
9. Leases, life estates, remainder interests, or other interests in real property.
10. Patents, copyrights, trademarks, service marks, franchises, or other such licenses.

If you do and if the information sought in this question has not been provided in another answer, for each item of property please state:

- a. A complete description of the item, including account number, registration number, other permanent identification numbers, and other specified identification.
- b. The full name and complete address of the person in whose name the item is held.
- c. The present value of the item.
- d. The amount of the indebtedness outstanding against the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 45:** Does KrisJenn Ranch now own, claim any interest in, or have title to any personal property (including but not limited to furniture, tools, appliances, computers, copiers) that is worth more than \$100 and that has not been described in a previous answer? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The complete address of its present location.
- c. The full name and complete address of the person or entity having possession or control of the item.
- d. The present estimated market value of the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 46:** Does KrisJenn—Uvalde now own, claim any interest in, or have title to any personal property (including but not limited to furniture, tools, appliances, computers, copiers) that is worth more than \$100 and that has not been described in a previous answer? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The complete address of its present location.
- c. The full name and complete address of the person or entity having possession or control of the item.
- d. The present estimated market value of the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 47:** Does KrisJenn—Pipeline Row now own, claim any interest in, or have title to any personal property (including but not limited to furniture, tools, appliances, computers, copiers) that is worth more than \$100 and that has not been described in a previous answer? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The complete address of its present location.

- c. The full name and complete address of the person or entity having possession or control of the item.
- d. The present estimated market value of the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 48:** Does Wright now own, claim any interest in, or have title to any personal property (including but not limited to furniture, tools, appliances, computers, copiers) that is worth more than \$100 and that has not been described in a previous answer? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The complete address of its present location.
- c. The full name and complete address of the person or entity having possession or control of the item.
- d. The present estimated market value of the item.
- e. The name of the person having title to or an interest in the item and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 49:** Does KrisJenn Ranch own, claim any interest in, or have title to any personal property now pledged as security for a debt? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The amount of the debt the property was pledged to secure and the current amount of the debt.
- c. The full name and complete address of the person or entity to whom the property is pledged.
- d. The date the debt is to be paid.
- e. The date the debt was incurred.

- f. The name of the person having title to or an interest in the property and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 50:** Does KrisJenn—Uvalde own, claim any interest in, or have title to any personal property now pledged as security for a debt? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The amount of the debt the property was pledged to secure and the current amount of the debt.
- c. The full name and complete address of the person or entity to whom the property is pledged.
- d. The date the debt is to be paid.
- e. The date the debt was incurred.
- f. The name of the person having title to or an interest in the property and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 51:** Does KrisJenn—Pipeline Row own, claim any interest in, or have title to any personal property now pledged as security for a debt? If so, for each item please state:

- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The amount of the debt the property was pledged to secure and the current amount of the debt.
- c. The full name and complete address of the person or entity to whom the property is pledged.
- d. The date the debt is to be paid.
- e. The date the debt was incurred.
- f. The name of the person having title to or an interest in the property and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 52:** Does Wright own, claim any interest in, or have title to any personal property now pledged as security for a debt? If so, for each item please state:



- a. A complete description of the item, including (as applicable) the year, make, model, serial number, and other permanent identification numbers.
- b. The amount of the debt the property was pledged to secure and the current amount of the debt.
- c. The full name and complete address of the person or entity to whom the property is pledged.
- d. The date the debt is to be paid.
- e. The date the debt was incurred.
- f. The name of the person having title to or an interest in the property and the nature of the interest.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 53:** Does KrisJenn Ranch maintain any account with any bank, savings and loan association, credit union, or postal savings department? If so, for each account please state:

- a. The full name and complete address of the institution holding the account.
- b. The full name and number under which the account is maintained.
- c. The balance of the account five calendar days before the day you received these interrogatories.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 54:** Does KrisJenn—Uvalde maintain any account with any bank, savings and loan association, credit union, or postal savings department? If so, for each account please state:

- a. The full name and complete address of the institution holding the account.
- b. The full name and number under which the account is maintained.
- c. The balance of the account five calendar days before the day you received these interrogatories.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 55:** Does KrisJenn—Pipeline Row maintain any account with any bank, savings and loan association, credit union, or postal savings department? If so, for each account please state:

- a. The full name and complete address of the institution holding the account.
- b. The full name and number under which the account is maintained.
- c. The balance of the account five calendar days before the day you received these interrogatories.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 56:** Does Wright maintain any account with any bank, savings and loan association, credit union, or postal savings department? If so, for each account please state:

- a. The full name and complete address of the institution holding the account.
- b. The full name and number under which the account is maintained.
- c. The balance of the account five calendar days before the day you received these interrogatories.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 57:** Does any person or entity owe KrisJenn Ranch money (including but not limited to promissory notes and accounts receivable)? If so, for each debt please state:

- a. The full name and complete address of the debtor.
- b. The amount and due date of the debt and to whom owed.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 58:** Does any person or entity owe KrisJenn—Uvalde money (including but not limited to promissory notes and accounts receivable)? If so, for each debt please state:

- a. The full name and complete address of the debtor.
- b. The amount and due date of the debt and to whom owed.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 59:** Does any person or entity owe KrisJenn—Pipeline Row money (including but not limited to promissory notes and accounts receivable)? If so, for each debt please state:

- a. The full name and complete address of the debtor.
- b. The amount and due date of the debt and to whom owed.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 60:** Does any person or entity owe Wright money (including but not limited to promissory notes and accounts receivable)? If so, for each debt please state:

- a. The full name and complete address of the debtor.
- b. The amount and due date of the debt and to whom owed.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 61:** Has any account receivable of KrisJenn Ranch been assigned or disposed of (other than by collection in full) in the last twelve months? If so, for each such account please state:

- a. The full name of the account.
- b. The kind of disposition.
- c. The date of the disposition.
- d. The full name and complete address of the person or entity taking the account.
- e. The amount of reserve due.
- f. The extent to which future accounts receivable were covered.
- g. The amount of payment received in exchange.
- h. The name of the person who owned the account.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 62:** Has any account receivable of KrisJenn—Uvalde been assigned or disposed of (other than by collection in full) in the last twelve months? If so, for each such account please state:

- a. The full name of the account.
- b. The kind of disposition.
- c. The date of the disposition.
- d. The full name and complete address of the person or entity taking the account.
- e. The amount of reserve due.
- f. The extent to which future accounts receivable were covered.
- g. The amount of payment received in exchange.
- h. The name of the person who owned the account.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 63:** Has any account receivable of KrisJenn—Pipeline Row been assigned or disposed of (other than by collection in full) in the last twelve months? If so, for each such account please state:

- a. The full name of the account.
- b. The kind of disposition.
- c. The date of the disposition.
- d. The full name and complete address of the person or entity taking the account.
- e. The amount of reserve due.
- f. The extent to which future accounts receivable were covered.
- g. The amount of payment received in exchange.
- h. The name of the person who owned the account.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 64:** Has any account receivable of Wright been assigned or disposed of (other than by collection in full) in the last twelve months? If so, for each such account please state:

- a. The full name of the account.
- b. The kind of disposition.
- c. The date of the disposition.
- d. The full name and complete address of the person or entity taking the account.

- e. The amount of reserve due.
- f. The extent to which future accounts receivable were covered.
- g. The amount of payment received in exchange.
- h. The name of the person who owned the account.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.

**INTERROGATORY NO. 65:** Has KrisJenn Ranch ever been a plaintiff or defendant in a lawsuit (including bankruptcy actions)? If so, for each suit please state:

- a. Its party designation (plaintiff, defendant, etc.).
- b. The names of the parties under which the suit was filed and indexed and the number of the suit.
- c. The name, number, and location of the court.
- d. The date the suit was filed.
- e. The damages and other relief sought by each party.
- f. The amount of any settlement offer in the case.
- g. The present status of the suit.
- h. The amount of any judgment entered against KrisJenn Ranch, date it was entered, and the name of the person against whom it was entered.
- i. KrisJenn Ranch’s current attorney of record in such suit, if any.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright..

**INTERROGATORY NO. 66:** Has KrisJenn—Uvalde ever been a plaintiff or defendant in a lawsuit (including bankruptcy actions)? If so, for each suit please state:

- a. Its party designation (plaintiff, defendant, etc.).
- b. The names of the parties under which the suit was filed and indexed and the number of the suit.
- c. The name, number, and location of the court.
- d. The date the suit was filed.
- e. The damages and other relief sought by each party.
- f. The amount of any settlement offer in the case.
- g. The present status of the suit.
- h. The amount of any judgment entered against KrisJenn—Uvalde, date it was entered, and the name of the person against whom it was entered.

- i. KrisJenn—Uvalde’s current attorney of record in such suit, if any.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright.

**INTERROGATORY NO. 67:** Has KrisJenn-Pipeline Row ever been a plaintiff or defendant in a lawsuit (including bankruptcy actions)? If so, for each suit please state:

- a. Its party designation (plaintiff, defendant, etc.).
- b. The names of the parties under which the suit was filed and indexed and the number of the suit.
- c. The name, number, and location of the court.
- d. The date the suit was filed.
- e. The damages and other relief sought by each party.
- f. The amount of any settlement offer in the case.
- g. The present status of the suit.
- h. The amount of any judgment entered against KrisJenn-Pipeline Row, date it was entered, and the name of the person against whom it was entered.
- i. KrisJenn-Pipeline Row’s current attorney of record in such suit, if any.

**ANSWER:** Larry Wright objects to answering this interrogatory as this interrogatory are not addressed to Mr. Wright in his individual capacity and do not apply to Mr. Wright

**INTERROGATORY NO. 68:** Has Wright ever been a plaintiff or defendant in a lawsuit (including bankruptcy actions)? If so, for each suit please state:

- a. Its party designation (plaintiff, defendant, etc.).
- b. The names of the parties under which the suit was filed and indexed and the number of the suit.
- c. The name, number, and location of the court.
- d. The date the suit was filed.
- e. The damages and other relief sought by each party.
- f. The amount of any settlement offer in the case.
- g. The present status of the suit.
- h. The amount of any judgment entered against Wright, date it was entered, and the name of the person against whom it was entered.
- i. Wright’s current attorney of record in such suit, if any.

**ANSWER:** Larry Wright objects to answering this post-judgment in its entirety as it is directed to him in his individual capacity for which no judgment exists against him. The March 26, 2024, final judgment in paragraphs 2 and 3 award a constructive trust and limit judgment creditors DMA and Longbranch to “receive 20% out of the net profits from a sale or future development income of the ROW” and specifically denies all other damages. Larry Wright Objects to this interrogatory

because it goes beyond the scope of the judgment, is overbroad and not tailored to lead to any discovery of recoverable assets because it is not tailored to the constructive trust.